IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

ESTATE OF ARMETIA CHATMON, aka ARMENTER CHATMON, pka "BO CARTER" OR "BO CHATMON",	)	
Plaintiff,	)	**No. 3:16-cv-02722**
v.	)	**District Judge: Crenshaw**
WARNER MUSIC GROUP CORP., et al.,	)	**Magistrate Judge: Newbern**
Defendants.	)	

JOINT MOTION TO:

(1) EXTEND THE TIME FOR DEFENDANTS WARNER MUSIC GROUP CORP., RHINO ENTERTAINMENT COMPANY, VIACOM INC., HAL LEONARD, LLC AND FOLKWAYS MUSIC PUBLISHERS, INC. TO RESPOND TO THE COMPLAINT; AND

(2) ADJOURN INITIAL CASE MANAGEMENT CONFERENCE

Plaintiff the Estate of Armetia Chatmon ("Plaintiff") and Defendants Warner Music Group Corp., Rhino Entertainment Company, Viacom Inc., Hal Leonard, LLC and Folkways Music Publishers, Inc. (collectively, "Moving Defendants") hereby respectfully request that the Court extend the time for the Moving Defendants to respond to the Complaint to May 8, 2017, the same date by which Defendant Eric Clapton ("Clapton") is required to respond to the Complaint. As grounds for this motion, the parties state that the allegations in the Complaint center on Clapton's alleged performance of a song over which Plaintiff claims ownership. Plaintiff and the Moving Defendants believe that all Defendants should proceed on the same timeline with respect to pleadings and discovery. Because of the 90 days afforded to Clapton by Fed. R. Civ. P. 4(d)(3) to respond to the Complaint, measured from Plaintiff's delivery of the service waiver form (*see* DE 53), Clapton's deadline to respond to the Complaint is May 8, 2017, the date request by this motion. Additionally, certain of the parties hereto have discussed the possibility of resolving this matter, and those discussions are ongoing.

The parties further request that the Court adjourn the Initial Case Management Conference currently scheduled for April 20, 2017 to a date after May 8, 2017 that is convenient for the Court, after all Defendants, including Defendant Clapton and the Moving Defendants, have responded to the Complaint.

WHEREFORE, Plaintiff and the Moving Defendants respectfully request that the Court (1) extend the time for Moving Defendants to answer, move or otherwise respond to the Complaint to May 8, 2017, and (2) adjourn the Initial Case Management Conference to a date after May 8, 2017.

Respectfully submitted,

LOEB & LOEB LLP

By: */s/ Brittany A. Schaffer*
Jonathan Zavin (admitted *pro hac vice*)
Barry Slotnick (admitted *pro hac vice*)
Wook Hwang (admitted *pro hac vice*)
Brittany A. Schaffer

35 Music Square East Suite 310
Nashville, Tennessee 37203
Tel: (615) 749-8301
bschaffer@loeb.com

345 Park Avenue
New York, New York 10154
Tel: (212) 407-4035
whwang@loeb.com
jzavin@loeb.com
bslotnick@loeb.com

Attorneys for Defendants Warner Music Group Corp., Rhino Entertainment Company, and Viacom Inc.

HALL BOOTH SMITH, P.C.

By: */s/ Karl Braun*
Karl M. Braun, BPR# 022371
Fifth Third Center
424 Church Street, Suite 2950
Nashville, Tennessee 37219
Kbraun@hallboothsmith.com
Tel: (615) 313-9911

ROBINS KAPLAN LLP
Paul V. LiCalsi (admitted *pro hac vice*)
Ofer Reger (admitted *pro hac vice*)
601 Lexington Avenue, Suite 3400
New York, NY 10022
Tel: (212) 980-7400
Plicalsi@robinskaplan.com
Oreger@robinskaplan.com

Attorneys for Defendants Hal Leonard, LLC and Folkways Music Publishers, Inc.

SHRUM & ASSOCIATES

By: */s/ Barry Shrum*
Barry Neil Shrum

144 2nd Avenue North, Suite 157
Nashville, TN 37201
Tel: (615) 338-5130
Barry@musicattorney.biz

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that: I have this 28th day of March 2017, served all parties in this matter with the foregoing **JOINT MOTION TO EXTEND TIME FOR DEFENDANT VIACOM INC. TO RESPOND TO THE COMPLAINT** by CM/ECF and/or Electronic Service to counsel of record as follows:

Barry Neil Shrum
Shrum & Associates
144 2nd Avenue North, Suite 157
Nashville, TN 37201
Attorneys for Plaintiff

Elliott J. Stein
Stevens & Lee, P.C.
100 Lenos Dr.
Suite 200
Lawrenceville, NJ 08648
Attorneys for Defendant J.W. Pepper & Sons, Inc.

Steven J. Zralek, Esq.
Bone, McAllester & Norton, PLLC
511 Union St., Suite 1600
Nashville, TN 37219
Attorneys for Defendant J.W. Pepper & Sons, Inc.

Karl M. Braun
Hall Booth Smith, P.C.
Fifth Third Center
424 Church Street, Suite 2950
Nashville, Tennessee 37219
Attorneys for Defendants Hal Leonard, LLC and Folkways Music Publishers, Inc.

Paul V. LiCalsi
Ofer Reger
Robins, Kaplan, Miller & Ciresi LLP
601 Lexington Avenue, Suite 3400
New York, NY 10022
Attorneys for Defendants Hal Leonard, LLC and Folkways Music Publishers, Inc.

Scott J. Sholder
Cowan, DeBaets, Abrahams & Sheppard LLP
41 Madison Ave., 34th Fl.
New York, NY 10010
Attorneys for Defendant Eric Clapton

By: */s/ Brittany A. Schaffer*
Brittany A. Schaffer